

COMMONWEALTH OF MASSACHUSETTS

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LISA RICCOBENE,	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 04-10256 MEL
	)	
MASSACHUSETTS BAY	)	
TRANSPORTATION AUTHORITY,	)	
and ANNE McCALL,	)	
Defendants.	)	
	)	

**JOINT MOTION THAT THE PARTIES' STIPULATION REGARDING  
CONFIDENTIALITY ENTER AS AN ORDER OF THIS COURT**

The parties in the above-captioned matter hereby jointly move that the Stipulated Protective Order Respecting Confidential Information that they have agreed upon and executed, and which is submitted herewith, be entered as an Order of this Court. As reasons therefore, the parties relate as follows.

1. The Plaintiff, Lisa Riccobene ("Plaintiff"), is a former employee of the Defendant, Massachusetts Bay Transportation Authority ("MBTA"), where she served as Executive Assistant to the Chief of the MBTA Police.

2. As set forth in the Complaint, the Plaintiff alleges, among other things, that the MBTA and one of its officers, Defendant, Anne McCall, discriminated against her on the basis of her sex and national origin, and retaliated against her, in violation of state and federal laws.

3. Much of the discovery exchanged between the parties to this case has or will involve documents and testimony concerning highly sensitive and confidential matters concerning the Plaintiff, the MBTA, and other MBTA current or former employees. Such

documents and information include, among other things: employee personnel information, psychiatric or medical records, sensitive information related to the law enforcement efforts and/or strategies of the MBTA, and other confidential, financial, or proprietary information.

4. In order to more fully ensure confidentiality and limit disclosure of the information, the parties jointly request that this Court endorse the Stipulated Protective Order Respecting Confidentiality which they have executed and which is attached hereto as part of the Proposed Order.

WHEREFORE, the parties request that this Court ALLOW their joint motion to adopt their Stipulated Protected Order Respecting Confidential Information as an order of this Court. A Proposed Order is attached hereto as Exhibit A.

Respectfully Submitted,

LISA RICCOBENE,

By her Attorney,

LAW OFFICE OF MITCHELL J. NOTIS

*/s/ Mitchell J. Notis*  
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Respectfully Submitted,

MASSACHUSETTS BAY  
TRANSPORTATION AUTHORITY and  
ANNE MCCALL,

By their Attorney,

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*/s/ Jeffrey A. Dretler*  
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